

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-12577 WGY

CRAIG GOULET, *
Plaintiff *
 *
v. *
 *
NEW PENN MOTOR EXPRESS, INC., and *
TEAMSTERS LOCAL 25, *
INTERNATIONAL BROTHERHOOD OF *
TEAMSTERS, *
Defendants *

PLAINTIFF'S PROPOSED VOIR DIRE

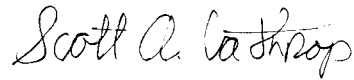
Plaintiff Craig Goulet requests that the following questions be asked of prospective jurors:

1. This is an action against a labor organization for breach of its duty of fair representation and against an employer for breach of a labor agreement. Plaintiff Craig Goulet is a member of defendant Teamsters Local 25. He alleges that Teamsters Local 25 did not fairly represent him in dealing with defendant New Penn Motor Express, a trucking company. Plaintiff Craig Goulet also alleges that defendant New Penn Motor Express breached its agreement with Teamsters Local 25 by failing to place him on call list and call him for employment opportunities. Would this subject matter impede your ability to render a fair and impartial verdict in such a case?
2. Have you or any of your family members ever served as an officer, business agent or steward of a labor organization?

- a. If so, have you or any of your family members ever been accused of not fairly representing a union member?
3. Have you or a member of your family ever been responsible for supervising union employees?
4. Have you or a member of your family ever been suspended or severely disciplined a union employee?
5. Have you or a member of your family ever been accused of violating a labor agreement or a union contract?

Craig Goulet

By his attorney



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Dated: June 19, 2006